

MKM:MKP/TH/MJL/KMT/KKO  
F. #2017R01840

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

CLARE BRONFMAN,

Defendant.

S U P E R S E D I N G  
I N F O R M A T I O N

Cr. No. 18-204 (S-3) (NGG)  
(T. 8, U.S.C., §§ 1324(a)(1)(A)(v)(I),  
1324(a)(1)(B)(i) and 1324(b); T. 18,  
U.S.C., §§ 982(a)(2)(B), 982(a)(6),  
982(b)(1), 1028(a)(7), 1028(b)(1)(D),  
1028(b)(5), 1028(c)(3)(A), 2 and 3551  
et seq.; T. 21, U.S.C., § 853(p); T. 28,  
U.S.C., § 2461(c))

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THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(Conspiracy to Conceal and Harbor Illegal Aliens for Financial Gain)

1. In or about and between October 2015 and January 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CLARE BRONFMAN, together with others, knowing and in reckless disregard of the fact that one or more aliens had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire to conceal, harbor and shield from detection such aliens in one or more places, including buildings and means of transportation, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(iii), which offense was done for the purpose of commercial advantage and private financial gain.

(Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and  
1324(a)(1)(B)(i); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO  
(Fraudulent Use of Identification)

2. In or about and between November 2016 and March 2018, both dates being approximate and inclusive, within the Northern District of New York and elsewhere, the defendant CLARE BRONFMAN, together with others, did knowingly and intentionally transfer, possess and use, without lawful authority and in and affecting interstate and foreign commerce, one or more means of identification of another person, to wit: Jane Doe 7, an individual whose identity is known to the United States Attorney, with the intent to commit, and aid and abet, and in connection with, unlawful activity that constituted one or more violations of Federal law, to wit: attempted tax evasion, in violation of Title 26, United States Code, Section 7201, resulting in the obtaining of things of value aggregating \$1,000 or more during a one-year period.

(Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1)(D),  
1028(c)(3)(A), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT ONE

3. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(6), Title 8, United States Code, Section 1324(b) and Title 28, United States Code, Section 2461(c), which require the forfeiture of: (a) any conveyance, including any vessel, vehicle or aircraft used in the commission of such offense; (b) any property, real or personal, that is used to facilitate, or is

intended to be used to facilitate, the commission of such offense; and (c) the gross proceeds of such offense.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 8, United States Code, Section 1324(b); Title 18, United States Code, Sections 982(a)(6) and 982(b)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT TWO

5. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 982(a)(2)(B), which requires any person convicted of such offense to forfeit any property constituting, or derived from,

proceeds obtained directly or indirectly as a result of such offense; and (b) Title 18, United States Code, Section 1028(b)(5), which requires any person convicted of such offense to forfeit any personal property used or intended to be used to commit the offense.


6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(2)(B), 982(b)(1) and 1028(b)(5); Title 21, United States Code, Section 853(p))

  
RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F. # 2017R01840  
FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

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## UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

*CLARE BRONFMAN,*

Defendant.

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### INFORMATION

( T. 8, U.S.C., §§ 1324(a)(1)(A)(v)(I), 1324(a)(1)(B)(i) and 1324(b); T. 18, U.S.C.,  
§§ 982(a)(2)(B), 982(a)(6), 982(b)(1), 1028(a)(7), 1028(b)(1)(D), 1028(b)(5),  
1028(c)(3)(A), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

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*A true bill.*

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*Foreperson*

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*Filed in open court this* \_\_\_\_\_ *day.*

*of* \_\_\_\_\_ *A.D. 20* \_\_\_\_\_

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*Clerk*

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*Bail, \$* \_\_\_\_\_

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*Moira Kim Penza, Tanya Hajjar, Mark Lesko and Karin Orenstein*  
*Assistant U.S. Attorneys (718) 254-7000*